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UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KARTHIK SALIGRAMA SHREERAM, et al.,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES,

Defendant.

Case No. 2:25-cv-00160-RSL

STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND ORDER

Plaintiffs and Defendant, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until June 6, 2025. Plaintiffs brought this litigation pursuant to the Administrative Procedure Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services ("USCIS") to adjudicate their Form I-485s, Applications to Register Permanent Residence or Adjust Status. Defendants' response to the Complaint is currently due on April 7, 2025. The parties are currently working towards a resolution to this litigation. For good cause, the parties request that the Court hold the case in abeyance until June 6, 2025.

Courts have "broad discretion" to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706

(1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants." *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

With additional time, this case may be resolved without the need of further judicial interpretation. USCIS has a find in a false translation of the power inherent in every court to

With additional time, this case may be resolved without the need of further judicial intervention. USCIS has adjudicated six of the twelve plaintiffs' applications. USCIS has issued Requests for Evidence ("RFE") to three of the plaintiffs. Once USCIS has received their responses to the RFEs, USCIS will review the responses and continue with processing. The remaining applications are in the adjudication process.

Because further time is needed for USCIS to complete processing, the parties agree that holding this case in abeyance through June 6, 2025, is appropriate. Therefore, the parties believe good cause exists for a stay in these proceedings to save the parties and this Court from spending unnecessary time and judicial resources on this matter.

Accordingly, the parties request that the Court hold the case in abeyance until June 6, 2025. The parties will submit a joint status report on or before June 6, 2025.

STIPULATED MOTION FOR ABEYANCE [Case No. 2:25-cv-00160-RSL] - 2

UNITED STATES ATTORNEY 1201 PACIFIC AVE., STE. 700 TACOMA, WA 98402 (253) 428-3800

1 DATED this 4th day of April, 2025. 2 Respectfully submitted, 3 TEAL LUTHY MILLER THE GALATI LAW FIRM, LLC 4 Acting United States Attorney 5 s/ Alexandra L. George s/ Michelle R. Lambert MICHELLE R. LAMBERT, NYS #4666657 ALEXANDRA L. GEORGE, PHV 6 Assistant United States Attorney The Galati Law Firm, LLC United States Attorney's Office 8080 Old York Road, Suite 204 7 Western District of Washington Elkins Park, Pennsylvania 19027 1201 Pacific Avenue, Suite 700 Phone: 215-310-0231 8 Tacoma, Washington 98402 Email: alex@galati.law Phone: (206) 553-7970 9 Fax: (206) 553-4067 Email: michelle.lambert@usdoj.gov GEORGE IMMIGRATION PLLC 10 Attorneys for Defendant s/ Anahita M. George 11 ANAHITA M. GEORGE, WSBA# 57799 George Immigration PLLC I certify that this memorandum contains 329 12 words, in compliance with the Local Civil Rules. 5719 Stetson Ct. NW Olympia, Washington 98502 13 Phone: 425-328-9339 Email: ageorge@justimmigrationusa.com 14 Attorneys for Plaintiffs 15 16 17 18 19 20 21 22 23 24

STIPULATED MOTION FOR ABEYANCE [Case No. 2:25-cv-00160-RSL] - 3

UNITED STATES ATTORNEY 1201 PACIFIC AVE., STE. 700 TACOMA, WA 98402 (253) 428-3800

ORDER

The case is held in abeyance until June 6, 2025. The parties shall submit a status update on or before June 6, 2025. It is so **ORDERED**.

Dated this 7th day of April, 2025.

MMS (asuk Robert S. Lasnik

United States District Judge